

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	
Melissa M. Caldwell	:	Chapter 13
Debtor	:	
	:	Case No. 1:21-00735
U.S. Bank National Association	:	
Movant	:	
	:	Answer to
v.	:	Motion for Relief from Stay
	:	
Melissa M. Caldwell	:	
	:	
Respondent	:	

RESPONDENT'S REPLY TO MOTION FOR
RELIEF FROM AUTOMATIC STAY OF SECURED CREDITOR

AND NOW, this 24th day of September, 2021, comes the respondent, Melissa M. Caldwell, by and through counsel, the CGA Law Firm and E. Haley Rohrbaugh, Esquire, and does file the within response averring that:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied.
5. Admitted.
6. Denied.
7. Denied. The Debtor is unaware of the current payoff on the loan.
8. Denied. The Debtor is currently applying for a Loan Modification to cure the mortgage arrears.
9. Denied. For the reasons stated above.

10. Denied. The movant is not entitled to relief from the automatic stay pursuant to 11 U.S.C. § 362(d).
11. Denied. Debtor has no knowledge as to whether movant has incurred cost and fees.
12. Denied. The averments of Paragraph 12 constitute conclusions of law to which no response of pleading is required.

WHEREFORE, it is requested that the relief sought not be granted.

Respectfully submitted,
CGA Law Firm

/s/ E. Haley Rohrbaugh
E. Haley Rohrbaugh, Esquire
Sup. Ct. I.D. No. 323803
135 North George Street
York, PA 17401
(717) 848-4900
Counsel for the Debtor

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	:	

CERTIFICATE OF SERVICE

I hereby certify that on September 24, 2019, service upon all interested parties indicated below was made by sending a true and correct copy of the Answer to Motion for Relief, by ECF and/or regular US Mail, postage prepaid, upon:

Charles J. DeHart, III, Esquire
Chapter 13 Trustee
ECF

Rebecca A. Solarz, Esquire
KML Law Group P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532

/s/ E. Haley Rohrbaugh
E. Haley Rohrbaugh, Esquire